URS

January 9, 2009

Ms. Terese VanDonsel
United States Environmental Protection Agency
Office of Superfund, Region 5
SR-6J
77 West Jackson
Chicago, IL 60604-3590

Subject: Subsurface Investigation Work Plan – Western Area
Detrex Source Control Area – Fields Brook Superfund Site
Detrex Corporation, Ashtabula, Ohio
Docket No. V-W-98-C-450

Dear Ms. VanDonsel:

On behalf of Detrex Corporation (Detrex), URS Corporation (URS) is submitting two (2) copies of the following Work Plan for subsurface investigation along the western portion of the Detrex property. During the joint USEPA / OEPA / FBAG meeting on Friday December 12, 2008 information was provided by FBAG that suggested DNAPL is migrating along the western boundary of the Detrex facility and reaching EU-6 along the lacustrine clay/till contract or other unexplained pathway. As shown by existing data collected in the southern area of the property, VOCs have not been detected in soil or groundwater from borings along the groundwater collection trench alignment. Also, as previously indicated Detrex does not agree with statements made that DNAPL is migrating to Fields Brook in EU-8 and EU-6 from the former lagoon area. The DNAPL and DNAPL impacted soil in EU-8, EU-6 and the North Sewer area is more likely related to historical impacts that were not remediated.

In order to provide additional subsurface data to USEPA that demonstrates the absence of viable subsurface migration pathways for DNAPL and that there are no impacts from DNAPL along the western portion of Detrex property, Detrex will collect additional soil and groundwater data. The following scope of work describes data to be collected.

1.0 SCOPE OF WORK

In general all sampling protocol (i.e. soil sampling, headspace screening, and well installation procedures) will be in accordance with the existing RD/RA Work Plan and QAPP that have been submitted to U.S. EPA in 2006 and 2007. The Scope of Work to be performed includes the following field procedures:

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1.1 Test Trench Excavations

In order to observe the nature of the upper 15-20 feet of the lacustrine soils and contact with the underlying till, 5 test trenches will be excavated adjacent to State Road, along the western property boundary.

The trenches will be located from the existing groundwater collection trench on the southern portion to the slurry wall on the northern portion of the property. The trenches will be evenly spaced at intervals of approximately 200 feet. The trenches will be approximately 10 feet long, 4 feet wide and 20 feet deep. Depending on field conditions observed, a maximum of 2 soil samples will be collected from each trench and analyzed for VOCs and SVOCs. Upon excavation, the trenches will remain open for approximately 24 hours prior to backfilling.

1.2 Soil Borings / Monitoring Wells

In order to evaluate subsurface conditions deeper than 20 feet (approx. elevation 610), within the glacial till, 5 soil borings will be drilled along the western property boundary. These borings will be positioned next to the 5 trench locations to observe subsurface conditions beneath the trenches. These 5 borings will be terminated at the bedrock surface or depths of approximately 590 feet msl, which is below the bottom of Fields Brook channel. During drilling, soil samples will be screened with a PID and the sample with the highest head space screening result will be submitted for analytical testing for VOCs and SVOCs. All borings will be drilled using hollow stem augers and continuously sampled to completion depth.

Upon completion of drilling three (3) nested pairs of monitoring wells will be installed to monitor shallow and deep groundwater bearing zones. Wells will be constructed of PVC with 10 foot well screens. The locations of the test trenches, soil borings, monitoring wells are provided on Figure 1. Depending on site access and utility clearance, the locations are subject to change.

2.0 SCHEDULE

At this time, the following schedule is anticipated:

Date	Description
Week of January 12, 2009	Utility clearance; test trench excavation
Week of January 19, 2009	Soil borings / monitoring wells
Week of January 26, 2009	Groundwater sampling

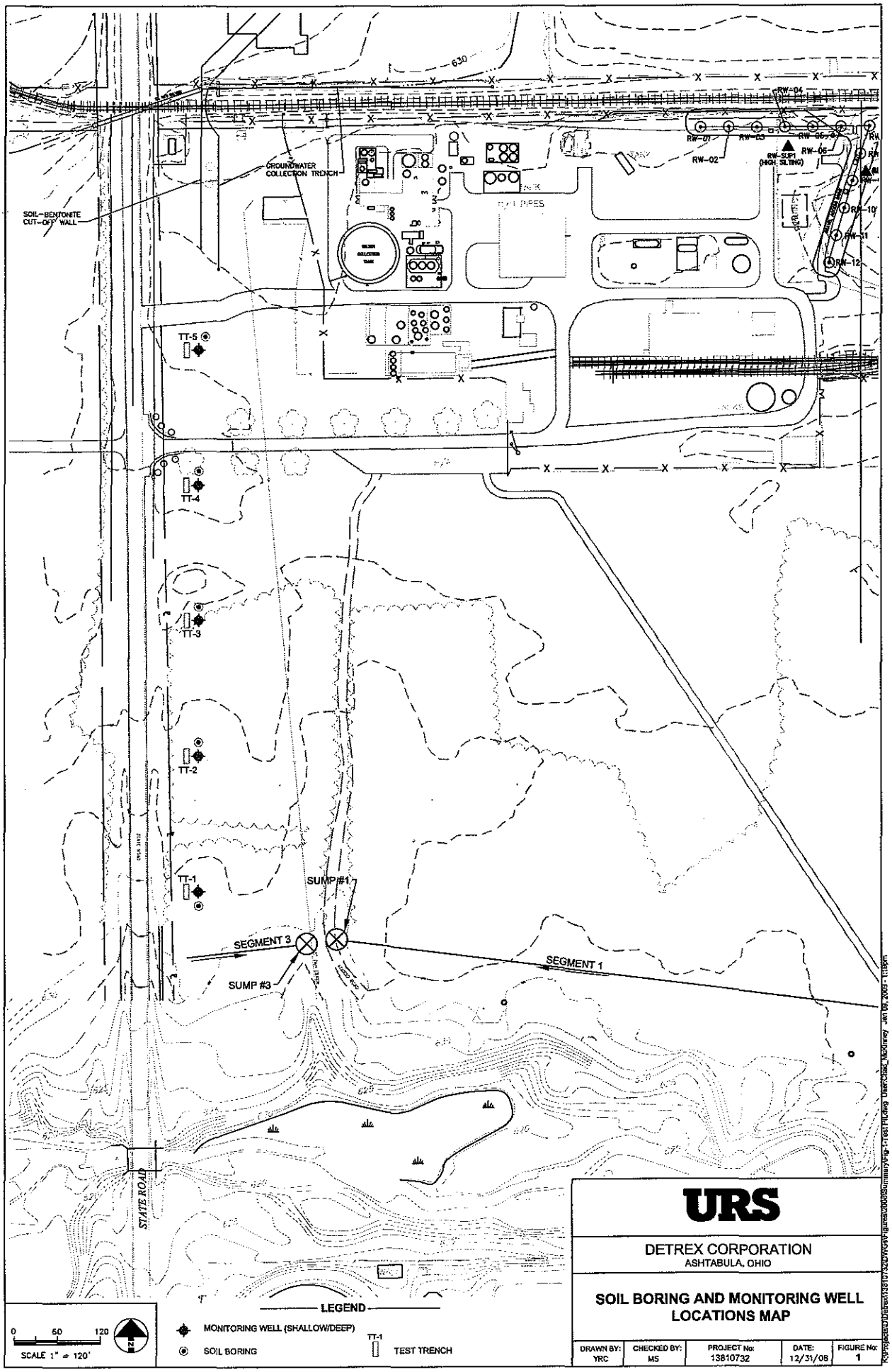
If you have any questions regarding this submittal, please do not hesitate to contact either Tom Steib at 440-997-6131 or me at 216-622-2432 at your convenience.
Sincerely,

URS Corporation - Ohio

Martin L. Schmidt, Ph.D.
Vice President

Enclosure

cc: R. Currie – Detrex Corporation
T. Doll - Detrex Corporation
R. Williams – Ohio EPA
T. Steib – Detrex Corporation
R. Rule – *de maximis, inc.*
D. Gray – URS



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DETREX CORPORATION
ASHTABULA, OHIO

SOIL BORING AND MONITORING WELL LOCATIONS MAP

DRAWN BY:	CHECKED BY:	PROJECT No:	DATE:	FIGURE No:
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